

EXHIBIT 45

CONFIDENTIAL



Transcript of **Karen Slaven**

Friday, April 8, 2022

*National Coalition on Black Civic Participation, et al.
v. Jacob Wohl, et al.*

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Reference Number: 115990

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----X
4 NATIONAL COALITION ON BLACK CIVIC
5 PARTICIPATION, MARY WINTER, GENE STEINBERG,
6 NANCY HART, SARAH WOLFF, KAREN SLAVEN, KATE
7 KENNEDY, EDA DANIEL, AND ANDREA SFERES,
8 Plaintiffs,
9 Civil Action No.:
10 20-cv-8668 (VM)(OTW)

11 People of the STATE OF NEW YORK, by its
12 attorney general, LETITIA JAMES, ATTORNEY
13 GENERAL OF THE STATE OF NEW YORK,

14 v.

15 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN &
16 ASSOCIATES, LLC, PROJECT 1599, MESSAGE
17 COMMUNICATIONS, INC., ROBERT MAHANIAN, and JOHN
18 and JANE DOES 1-10,

19 Defendants.

20 -----X
21 April 8, 2022
22 3:48 p.m.
23
24
25

26 REMOTE CONFIDENTIAL EXAMINATION BEFORE
27 TRIAL of KAREN SLAVEN, the Plaintiffs in the
28 above-entitled action, taken on behalf of the
29 Defendants, held at the above date and time,
30 and taken before Dorene Glover, an RSR Reporter
31 and Notary Public within and for the State of
32 New York.

1 A P P E A R A N C E S:

2

3 ORRICK, HARRINGTON & SUTELIFFE
4 Attorneys for Plaintiffs
5 51 West 52nd Street
6 New York, New York 10019
7 BY: AARON GOLD, ESQ.
8 RYAN LIND, ESQ.

7

8 GERSTMAN SCHWARTZ, LLP.
9 Attorneys for Defendants
10 60 East 42nd Street
11 New York, New York 10165
12 BY: RANDY KLEINMAN, ESQ.
13 DAVID SCHWARTZ, ESQ.

11

12 LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER LAW
13 1500 K Street, NW
14 Washington, DC 20005
15 BY: DAVID BRODY, ESQ.

15

16 NYS Office of Attorney General
17 Attorneys for Defendants
18 28 Liberty Street
19 New York, New York 10005
20 BY: RICK SAWYER, ESQ.
21 COLLEEN FAHERTY, ESQ.

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1 Q. Where do you work?

2 A. Key Bank.

3 Q. What do you do for them?

4 A. I'm a data analyst programmer.

5 Q. How long have you been doing that
6 for?

7 A. With Key Bank.

8 Q. Yes.

9 A. Since 1997, I believe.

10 Q. What is your race or ethnicity?

11 A. Caucasian.

12 Q. What are your current policy
13 affiliations?

14 A. What I'm registered as?

15 Q. Okay, that's one question.

16 A. I'm registered as a democrat.

17 Q. So is it fair to say you are
18 registered to vote?

19 A. Correct.

20 Q. What is your vote or registration
21 address?

22 A. My home address.

23 Q. How long have you been registered
24 as a democrat for approximately?

25 A. 35 years, 40 years.

1 MR. GOLD: Objection.

2 A. It's my opinion based on who I know
3 received the call and who I know that did not.

4 Q. Who do you know that received the
5 call?

6 A. A lot of people in East Cleveland.

7 Q. Specifically who?

8 A. Our house, Eda's house. I heard
9 other people talking about it at meetings. I
10 know it was hit in East Cleveland.

11 Q. The people that you heard talking
12 about it at the meetings, did any of them --
13 are any of them members of a minority
14 community?

15 A. Yes.

16 Q. Have you personally spoken to
17 anyone in the Black community who received this
18 call?

19 A. No.

20 Q. Why not?

21 A. I just haven't.

22 Q. You were angered by it, though?

23 A. Yes.

24 Q. You thought it was designed to
25 target the Black community, why didn't you

1 EXAMINATION BY

2 MR. GOLD:

3 Q. Ms. Slaven, thank you again. Can
4 you now please turn to the final page of the
5 complaint. I believe it's Exhibit C.

6 A. Okay.

7 Q. Can you tell me whose the name of
8 the person who is signed that?

9 A. Julie Corcova (phonetic).

10 Q. Thank you. We can go to I think it
11 might be Exhibit D bated-stamped, Slaven 0143.
12 Can you see that?

13 A. Yes.

14 Q. Could you read the first two
15 sentences?

16 A. Thank you for registering your
17 phone number with the national do not call
18 registry. You successfully registered your
19 phone number ending in 8536 on July 6th, 2003.

20 Q. Can you please again for the record
21 restate your home phone number?

22 A. 216-321-8536.

23 Q. You testified earlier that you do a
24 lot of work to promote voter registration and
25 to help people vote?

1 A. Yes.

2 Q. Can you please tell us more about
3 that, why is it important?

4 A. Because I think everyone should
5 participate in the voting process that's what
6 forms a democracy.

7 Q. When you heard the Robocall, how
8 did that make you feel about your work to
9 promote voting?

10 A. Pretty angry and frustrated that I
11 spend hours and hours trying to walk around
12 neighborhoods and educate people and then to
13 have something like that to go out and to
14 intimidate those people not to vote.

15 MR. GOLD: Understood. I don't
16 have any further questions at this time.

17 EXAMINATION BY

18 MR. KLEINMAN:

19 Q. I just have one.

20 Ms. Slaven, one last question, do
21 you know who bears the burden of ensuring that
22 numbers registered to the do-not-call registry
23 do not receive Robocalls?

24 MR. GOLD: Objection. Calls for a
25 legal conclusion.

C E R T I F I C A T E

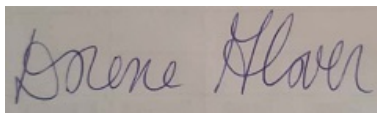
STATE OF NEW YORK)
SS.:
COUNTY OF BRONX)

I, DORENE GLOVER, a Notary Public for
and within the State of New York, do hereby
certify:

That the witness whose examination is
hereinbefore set forth was duly sworn and that
such examination is a true record of the
testimony given by that witness.

I further certify that I am not related
to any of the parties to this action by blood
or by marriage and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand this 26th day of April, 2022.



DORENE GLOVER